

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Rene Birch Bankston, Jr., Debtor**

**Case No. 25-50674-KMS  
CHAPTER 7**

**MOTION TO EXTEND AUTOMATIC STAY**

COMES NOW Debtor by and through their undersigned attorney, pursuant to 11 U.S.C. §362(c)(3)(B), and respectfully move this court to continue the automatic stay provided under 11 U.S.C. §362(a) as to all creditors, and in support thereof would show:

1. That this Court has jurisdiction over this matter pursuant to 11 U.S.C. §105(a), 28 U.S.C. §157(b)(1), and 28 U.S.C. §1334. This matter constitutes a core proceeding as defined by 28 U.S.C. §157(b)(2).
2. That on 05/08/2025, Debtor filed the petition for relief under Chapter 7 in the instant cause.
3. That on or about 3/31/2025 Debtor filed a Chapter 13 proceeding, case number 25-50452, and said case dismissed on 4/29/2025.
4. That debtor filed the instant case in good faith and only after a substantial change in the financial and personal affairs of the Debtor.
5. That this motion is not made for the purposes of delay, but in good faith.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully requests the Court continue the stay under 11 U.S.C. §362(a) as to all creditors for the duration of this Chapter 7 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2), or a motion for relief from stay is granted under §362(d). Debtors further requests any additional relief, general or specific, to which they may be entitled.

Respectfully submitted,

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:  
Thomas C. Rollins, Jr.  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
601-500-5533

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Rene Birch Bankston, Jr., Debtor**

**Case No. 25-50674 KMS  
CHAPTER 7**

**DECLARATION IN SUPPORT OF MOTION TO EXTEND THE  
AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(c)(3)**


The debtor, in support of the Motion to Extend the Automatic Stay, states as follows:

1. I have personal knowledge of the facts listed in the foregoing situation.
2. I am over the age of 18, of sound mind, am capable of making this Declaration, and am fully competent to testify to the matters stated herein.
3. I filed this bankruptcy petition on 05/08/2025.
4. I previously filed bankruptcy case number 25-50452 under Chapter 13 on 3/31/2025 and that case was dismissed on 4/29/2025.
5. I have had no other pending bankruptcy cases in the preceding one-year period.
6. I have not had any prior cases dismissed in the past year for any of the following reasons:
  - Failure to file or amend the petition or other required documents without substantial excuse;
  - failure to provide adequate protection as ordered by the Court; or
  - failure to perform the terms of a plan confirmed by the Court.
7. I have had a substantial change in my financial or personal affairs since the dismissal of the last case, and I believe that this case will result in a discharged chapter 7 case.
8. Those changes are as follows:

My credit counseling had expired before I filed my previous case. I now have an unexpired credit counseling certificate.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 5/08/2025

  
Rene Birch Bankston, Jr.

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Motion to Extend Automatic Stay and Declaration were forwarded on May 9, 2025, to:

By Electronic CM/ECF Notice:

Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

RENE BIRCH BANKSTON JR

CASE NO: 25-50674

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 7

On 5/9/2025, I did cause a copy of the following documents, described below,  
Motion to Extend Stay and Declaration in Support

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 5/9/2025

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401  
601 500 5533  
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

RENE BIRCH BANKSTON JR

CASE NO: 25-50674

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 7

On 5/9/2025, a copy of the following documents, described below,  
Motion to Extend Stay and Declaration in Support

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 5/9/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401

## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

## CASE INFO

LABEL MATRIX FOR LOCAL NOTICING  
NCRS ADDRESS DOWNLOAD  
CASE 25-50674  
SOUTHERN DISTRICT OF MISSISSIPPI  
FRI MAY 9 8-4-39 PST 2025

~~EXCLUDE~~

~~US BANKRUPTCY COURT  
DAN M RUSSELL JR US COURTHOUSE  
2012 15TH STREET SUITE 244  
GULFPORT MS 39501-2036~~

AMEX  
PO BOX 981535  
EL PASO TX 79998-1535

BARCLAYS BANK DELAWARE  
ATTN BANKRUPTCY  
PO BOX 8801  
WILMINGTON DE 19899-8801

CBE GROUP  
1309 TECHNOLOGY PKWY  
CEDAR FALLS IA 50613-6976

CADENCE BANK  
818 HWY 12 W  
STARKVILLE MS 39759-3595

CAPITAL ONE  
ATTN BANKRUPTCY  
PO BOX 30285  
SALT LAKE CITY UT 84130-0285

CITIBANK  
PO BOX 790040  
ST LOUIS MO 63179-0040

CREDIT ONE BANK  
6801 CIMARRON RD  
LAS VEGAS NV 89113-2273

DAVID FOGEL  
1225 FRANKLIN AVE  
STE 101  
GARDEN CITY NY 11530-1659

DISCOVER FINANCIAL  
ATTN BANKRUPTCY  
PO BOX 3025  
NEW ALBANY OH 43054-3025

(P)EQUIPMENTSHARE  
ATTN TIM JOHNSON  
2000 E BROADWAY PMB 124  
COLUMBIA MO 65201-6009

FCCI INSURANCE  
PO BOX 650429  
ATLANTA GA 30384-0001

FINTEGRA  
1150 1ST AVE  
STE 105  
KING OF PRUSSIA PA 19406-1350

GB COLLECTS LLC  
1253 HADDONFIELD  
BERLIN RD  
VOORHEES NJ 08043-4847

HE EQUIPMENT  
7500 PECUE LANE  
BATON ROUGE LA 70809-5107

HERC RENTALS  
18321 VENTURA BLVD  
TARZANA CA 91356-4228

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PHILADELPHIA PA 19101-7346

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STE 4430  
JACKSON MS 39201-5025

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18321 VENTURA BLVD  
STE 1000  
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JOSHUA KESSELMAN  
1915 HOLLYWOOD BLVD  
STE 200  
HOLLYWOOD FL 33020-4547

JPMCB  
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700 KANSAS LANE  
MONROE LA 71203-4774

KEESLER FCU  
ATTN BANKRUPTCY  
2602 PASS RD  
BILOXI MS 39531-2728

MS DEPT OF EMPLOYMENT  
PO BOX 1699  
JACKSON MS 39215-1699

MS DEPT OF REVENUE  
BANKRUPTCY SECTION  
PO BOX 22808  
JACKSON MS 39225-2808

ON DECK  
4700 W DAYBREAK PKWY  
SOUTH JORDAN UT 84009-5133

ONDECK CAP  
1400 BROADWAY  
NEW YORK NY 10018-5300

## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

SBA  
CO US ATTORNEYS OFFI  
501 E COURT ST  
STE 4430  
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SMALL BUSINESS ADMINIS  
PO BOX 740192  
ATLANTA GA 30374-0192

SOUTHWAY CRANE  
PO BOX 200494  
DALLAS TX 75320-0494

SUNBELT RENTALS  
P O BOX 409211  
ATLANTA GA 30384-9211

THE LA SOURCE GROUP  
8711 E PINNACLE PEAK  
SCOTTSDALE AZ 85255-3517

US ATTORNEY GENERAL  
US DEPT OF JUSTICE  
950 PENNSYLVANIA AVENW  
WASHINGTON DC 20530-0001

US DEPARTMENT OF LABOR  
DFEC CENTRAL MAILROOM  
PO BOX 8300  
LONDON KY 40742-8300

US DEPARTMENT OF LABOR  
CO US ATTORNEY  
501 EAST COURT ST  
STE 4430  
JACKSON MS 39201-5025

UNIQUE FUNDING  
71 S CENTRAL AVE  
VALLEY STREAM NY 11580-5495

UNITED RENTALS  
2490 S COLLEGE ST  
AUBURN AL 36832-6920

~~EXCLUDE~~  
~~UNITED STATES TRUSTEE~~  
~~501 EAST COURT STREET~~  
~~SUITE C 430~~  
~~JACKSON MS 39201-5022~~

VINNIE AUBREY  
3050 PEACHTREE RD NW  
STE 240  
ATLANTA GA 30305-2212

DEBTOR  
RENE BIRCH BANKSTON JR  
13482 JOHN CLARK RD  
GULFPORT MS 39503-4821

~~EXCLUDE~~  
~~THOMAS CARL ROLLINS JR~~  
~~THE ROLLINS LAW FIRM PLLC~~  
~~PO BOX 13767~~  
~~JACKSON MS 39236-3767~~

~~EXCLUDE~~  
~~ZACHARY S WESSLER SR~~  
~~1806 23RD AVENUE SUITE A~~  
~~GULFPORT MS 39501-2963~~